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BOP Inmate 917-727-9194

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**SUPPLEMENT TO EMERGENCY MOTION \* \* \* THREAT OF COVID-19 \* \* \* SUPPLEMENT TO EMERGENCY MOTION**

**APRIL 15, 2020**

THE HONORABLE ANN M. DONNELLY  
UNITED STATES DISTRICT JUDGE  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
225 CADMAN PLAZA EAST  
BROOKLYN, NEW YORK 11201

**Re: United States v. Christopher E. Reese-Thomas, Docket No. 02-CR-441 (AMD)**

Dear Judge Donnelly:

Defendant respectfully submits this supplement to the pending emergency motion to modify the four month term of imprisonment imposed in this case.

By order dated April 13, 2020, the Court directed the Government to file a response no later than the close of business today. It does not appear that any response was filed. The Court also directed the Government to inform the Court of whether the issue raised by the motion is better addressed to Judge Marrero in the Southern District. In this regard, Defendant submits that he is currently scheduled to be released on December 3, 2020. However, Defendant is eligible for, and has been recommended for placement in a Residential Reentry Center/Home Confinement for a period of six months -- making Defendant eligible for release to a Residential Reentry Center or Home Confinement on June 3, 2020. If the Court grants the pending emergency motion, Defendant would be eligible for release now and would likely be released by the Bureau of Prisons at this time. Accordingly, despite the relative short term of imprisonment imposed in this case, immediate action by this Court may very well save this Defendant's life.

Wherefore, the Court should grant Defendant's unopposed emergency motion for a sentence modification, and the Court should either reduce the four month term to one day, or amend the judgment and order the four month term to run concurrently with the 108 month currently being served.

Respectfully submitted,

/s/ Christopher E. Reese-Thomas

CHRISTOPHER E. REESE-THOMAS-----  
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cc: U. S. Attorneys Office (EDNY)